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7 ATTORNEYS FOR PLAINTIFF  
FEDERAL TRADE COMMISSION

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 NEXTCLICKMEDIA, LLC, *et al.*,

16 Defendants.

Case No. C08-1718-VRW

STIPULATION FOR ORDER  
EXTENDING DEADLINE FOR FILING  
RESPONSIVE PLEADINGS AND  
~~PROPOSED ORDER~~

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18  
19  
20 WHEREAS, Defendants NextClickMedia, LLC's, Next Internet, LLC's, Kenneth  
21 Chan's and Albert Chen's (collectively, "Defendants") response to Plaintiff Federal Trade  
22 Commission's (the "FTC") Complaint is currently due on Monday, February 2, 2009;

23 WHEREAS, the parties to this action have continued to exchange information and  
24 proposed settlement provisions with the intention of exploring the possibility of settlement of  
25 this matter;

26 WHEREAS, the FTC is willing to extend the time for Defendants to file their responses  
27 to Plaintiff's Complaint in order to focus on settlement discussions; and

28 WHEREAS the parties have scheduled a multi-day negotiating session for the first week

1 in February in an attempt to finalize an agreement;

2 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the FTC and  
3 Defendants, through their respective counsel, that Defendants' time to move, answer or  
4 otherwise respond to the Complaint shall be and hereby is extended to and including May 4,  
5 2009; and

6 IT IS FURTHER STIPULATED that the Case Management Conference, currently  
7 scheduled for March 26, 2009, at 3:30 p.m., be rescheduled to June 25, 2009, at 3:30 p.m., and  
8 that the date for filing the Case Management Statement be extended to June 15, 2009.

9  
10 Dated: 1/27/09

/s/

MICHAEL C. LYNCH  
KELLEY DRYE & WARREN LLP  
ATTORNEY FOR DEFENDANTS

11  
12 Dated: 1/27/09

/s/

JANICE L. CHARTER  
DAVID M. NEWMAN  
THOMAS N. DAHDOUH  
ATTORNEYS FOR PLAINTIFF

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14  
15  
16  
17 **ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated: 1/30/2009

20 VAUGHN R. WALKER  
UNITED STATES DISTRICT COURT JUDGE

